

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE,	:	Civil Action No. 23-cv-10628 (JGLC)
	:	
Plaintiff,	:	<b>DECLARATION OF</b>
	:	<b>JONATHAN D. DAVIS</b>
v.	:	<b>IN SUPPORT OF</b>
	:	<b>MOTION TO DISMISS</b>
	:	<b><u>AMENDED COMPLAINT</u></b>
SEAN COMBS; HARVE PIERRE; THE THIRD	:	
ASSAILANT; DADDY’S HOUSE RECORDINGS,	:	
INC. and BAD BOY ENTERTAINMENT	:	
HOLDINGS, INC.,	:	
	:	
Defendants.	:	

JONATHAN D. DAVIS declares as follows:

1. I am the sole shareholder of Jonathan D. Davis, P.C., attorneys for Defendants Sean Combs, Daddy’s House Recordings, Inc., and Bad Boy Entertainment Holdings, Inc. (the “Combs Defendants”).

2. I submit this declaration in support of the Combs Defendants' motion under Fed. R. Civ. P. 12(b)(6) for an order dismissing the Amended Complaint [Dkt. No. 52] with prejudice.

3. Attached as Exhibit A is a true and correct copy of a redline copy of the Amended Complaint [Dkt. No. 52-1], showing the amendments to the Complaint [Dkt. No. 1].

4. Attached as Exhibit B is a true and correct copy of the Order, dated March 7, 2024, issued by the Court in *Bellino v. Tallarico*, No. 1:24-cv-00712 (LAK) (S.D.N.Y) [Dkt. No. 14], denying plaintiff's motion for reconsideration.

5. Attached as Exhibit C is a true and correct copy of the Memorandum Endorsement, dated April 26, 2024, in *Bellino v. Tallarico*, No. 1:24-cv-00712 (LAK) (S.D.N.Y) [Dkt. No. 28], denying plaintiff's motion for leave to amend her complaint.

6. Attached as Exhibit D is a true and correct copy of an excerpt of the New York City Council's Legislation Text for Introduction No. 1012-A, Local Law No. 2018/063, which provides, *inter alia*, the N.Y.C. Admin. Code § 10-1104, effective prior to January 9, 2022.

7. Attached as Exhibit E is a true and correct copy of the New York City Council's Legislation Text for Introduction No. 2372-B, Local Law No. 2022/021, which provides, *inter alia*, the N.Y.C. Admin. Code § 10-1104, effective as of January 9, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed at New York, New York, on this 10th day of May 2024.

/s/ Jonathan D. Davis  
JONATHAN D. DAVIS